Filed 06/06/2008

Dan Levy

From:

Anthony H. Lowenberg [anthony.lowenberg@hsblaw.com]

Sent:

Friday, May 23, 2008 1:57 PM

To:

Dan Levy

Cc:

Ron Paltrowitz; John Bostany

Subject:

FW: GMA v. ePartners

Attachments: RE: GMA's responses to eParterns' discovery requests

In response to your email of this morning, please see below. Thanks.

Anthony H. Lowenberg Hermes Sargent Bates, L.L.P. 901 Main Street, Suite 5200 Dallas, Texas 75202 214.749.6564 | 214.749.6364 fax www.HSBlaw.com

From: Anthony H. Lowenberg

Sent: Thursday, May 22, 2008 9:26 PM

To: 'ron.paltrowitz@bozlaw.com'

Cc: Amy Davis

Subject: RE: GMA v. ePartners

Hi Ron,

Not that I'm confused, but the discovery was apparently not served on anyone at HSB. I will check with Peter and Melissa, and perhaps you can do the same with Jessica (who signed it). Is there a transmittal letter or a certificate of service you can reference/send us? I'll get with you soon about when to respond to them, I'm simply unable to tell you as of this moment, having just seen the requests, and I would like to get to the bottom of this service issue as well.

Please don't forget about letting us know where the depo will be Tuesday. We'll need that before everyone takes off for the long weekend.

Thanks,

Anthony

From: Ron Paltrowitz [mailto:ron.paltrowitz@bozlaw.com]

Sent: Thursday, May 22, 2008 11:13 AM

To: Anthony H. Lowenberg

Cc: Amy Davis; pbrown@bakerlaw.com; mcarvalho@bakerlaw.com; John Bostany; Dan Levy

Subject: RE: GMA v. ePartners

Anthony:

Are you just confused as to how the discovery requests were served or is it that you do not personally have a copy of them? I noticed that you did not copy Amy, Peter or Melissa on your e-mail. You might want to check with them. We need to know when you are going to respond. Please let me know as soon as possible. In the interim I have attached copies of the documents.

Ron

From: Anthony H. Lowenberg [mailto:anthony.lowenberg@hsblaw.com]

Sent: Thursday, May 22, 2008 11:55 AM

To: Ron Paltrowitz; Dan Levy Subject: GMA v. ePartners

Hi Ron & Dan:

- 1) Mario Hebert's number in the Congo DRC is + 243 99 540 70 56. I believe that's a cell phone. We do not have a physical address for him there.
- 2) When and how was the second set of discovery served? Rest assured that we are not intentionally not responding to discovery. If you can clear that up for me, that would be great, and we'll work it out.
- 3) Do you know the address/room number for the Forgo deposition at the Mohegan?
- 4) Re: Ron's mention of a letter from him regarding documents withheld per a privilege, to which letter are you referring? We'll be happy to address any unresolved issues.

Thank you much,

Anthony

Anthony H. Lowenberg Hermes Sargent Bates, L.L.P. 901 Main Street, Suite 5200 Dallas, Texas 75202 214.749.6564 | 214.749.6364 fax www.HSBlaw.com



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